

KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA
I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL

WAI 3300

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF Tomokia ngā tatau o Matangireia - the
Constitutional Kaupapa Inquiry

MEMORANDUM OF THE CROWN IN RESPONSE TO WAI 3342 AND
WAI 1194/1212 APPLICATIONS FOR URGENCY

10 April 2024



**Te Tari Ture
o te Karauna**
Crown Law

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Waitangi Tribunal

10 Apr 24

Ministry of Justice
WELLINGTON

Barrister instructed:

Gregor Allan
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MAY IT PLEASE THE TRIBUNAL:

1. This memorandum of counsel responds to the directions of the Presiding Officer that the Crown file any submissions on the new Wai 3342 application for urgency or the amended Wai 1194/1212 application for urgency by 3pm today.
2. In the time available, the Crown notes that it is not apparent from the applications for urgency which Crown policy or proposal would be the subject of an urgent inquiry. The claim seems to be of a very general nature. The specific policies or proposals that are mentioned are the Treaty Principles Bill proposal and actions concerning te reo, both of which are already the subject of urgency applications or inquiries that are underway.
3. In these circumstances, the Crown relies on its submissions dated 9 February 2024 (Wai 3300 #3.1.3).

10 April 2024



L Theron
Counsel for the Crown